

HISTORIC BUILDINGS COUNCIL

An advisory Council to the Department for Communities

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Belfast Planning Office

15th November 2018

Dear Sir

Belfast Local Development Plan 2035

The Historic Buildings Council advises the Department for Communities on the listing and protection of historic buildings across Northern Ireland, and we would like to comment on your plan with particular reference to historic buildings.

As the capital city of Northern Ireland Belfast of course has a particularly dense concentration of listed buildings, and we want to ensure that your plan reflects the importance of these buildings and the contribution which they can make to Belfast's future development. Our comments follow the structure of the general principles of the plan, with references to some of the related detailed policies.

We would start by pointing out that historic buildings contribute to all four of your strategic aims. Their attractiveness and compactness make Belfast a "liveable place"; their character and flexibility provide unique opportunities for existing and new businesses, so contributing to the "vibrant economy"; their scale and diversity make the city "smart and resilient"; and finally re-using existing buildings rather than building new ones is the most globally sustainable and "green" way of developing cities.

Without repeating those general points, it can be appreciated that the built heritage contributes to each of the eight strategic policies. Making the best use of our existing buildings is the most sustainable way of developing the city; people report better health and mental well-being in areas with a concentration of historic buildings; and the built heritage is a common culture which enhances community relations.

Turning to the topic-based policies, we would like to comment on these in more detail, referring from time to time to related policies and paragraphs in the full report:

SHAPING A LIVEABLE PLACE:

1. Housing:

The plan is to “have set land aside for 31,600 new homes”, and since these are to be close to services like shops and health centres that implies further additional development, with concomitant dispersal from the historic city centre. Since the intention is to house 66,000 additional people and many households will consist of two or more people that suggests that there is little intention to make use of existing empty or redundant buildings to provide houses.

Given that Belfast’s population had declined by over 30% in the forty years from 1971, one would normally assume that there was sufficient housing stock to accommodate the additional 66,000 people without any new building. Of course many houses and other buildings were demolished during that time, but others still exist, albeit derelict, and above all there is unused accommodation in the upper floors of commercial buildings. In the past many people occupied space in city centre buildings, and with the Troubles now behind us that is once more an attractive option, particularly for young people who want to be close to their jobs and leisure activities.

It is important that bringing a disused building into use for housing is seen as part of the meeting of the housing target, and that housing is not simply measured in new units. Bringing some houses scheduled for demolition back into use may be the quickest and least environmentally damaging way of meeting the housing target. There is also a lot of land in small pockets around the city centre which can be used for modest housing schemes before there is a need to release further land in the outer city for larger and inevitably more monolithic schemes.

While houses are obviously the preferred option for families, many young single people like shared flats, and others, particularly those coming from another region or culture, can benefit from living with families as lodgers. Shared living of that kind helps to integrate people and cement communities.

Policy HOU12 suggests that permission will be granted for student housing of more than 200 occupants. That means the construction of massive buildings which will do nothing to enhance the existing streetscape, and indeed will often involve the destruction of earlier buildings. We would suggest that there is nothing wrong with smaller units and that they can be slotted in with much less damage to the urban environment.

Figures for homelessness and housing stress do not look at the causes of such conditions, and without wishing to make light of problems which can be very serious to those affected, it should be pointed out that a proportion of the figures arise from the ongoing clearance of areas of older housing stock that could often be rehabilitated and brought back into use with less disruption. The pattern of religiously-segregated housing estates with poor transport links

to city centre jobs is another aspect of housing in the city that could usefully be addressed.

We would suggest that growing the city's population does not necessarily involve building as many homes as projected, and that much more should be made of the existing building stock. Hearth Housing Association, in carrying out research into its tenants across Northern Ireland, typically found that 98% considered the built heritage important, and around 80% actually preferred living in an old house rather than a new one - an option which is not often available to social housing tenants.

2. Urban Design and Built Heritage:

We welcome the emphasis on keeping and reusing older buildings in this section. However we would suggest that a realistic policy to restrict construction of tall buildings is urgently needed. Tall buildings are rarely of sufficient design quality to justify their scale, and they have the concomitant effects of making land less affordable and diverting investment from maintaining existing buildings to supposedly more profitable development. They make an inhospitable environment for pedestrians, create wind tunnels, are expensive to run and maintain, and rarely have a long life.

Policy HOU4 suggests that tall buildings will be permitted, but doesn't define any height limit; **Policy DES3** suggests that tall is defined as over 35m, but does not suggest any control below that even though most historic buildings would be considerably lower. Six stories would be a tall building in the historic core of the city and should already be carefully controlled. Anything over that should only exceptionally be permitted in the city centre, with tall buildings possibly being more acceptable in the Titanic quarter. We note that existing tall buildings will not be taken as a precedent, but **figure 7.4** showing existing and approved buildings over 35m tall suggests that nearly a quarter of the city centre is already dominated by such constructions.

We obviously support high quality design when new buildings are erected, and hope that a number of new buildings will become listed buildings in future. However we would caution that good quality design implies well-considered briefs and thought being given to flexibility of use and quality of materials to ensure the building has a long life.

Until recent years it was possible to get views of the city hills from many parts of the city centre, but most of those views have been blocked by insensitive and over-tall new buildings. Thought should be given in approving new buildings of any size or mass to the effect on views within and out of the city. (This is mentioned in **policy DES3**)

Historic buildings (whether listed or in conservation areas and ATCs, or even without any formal protection) give unique character to a place and often offer flexible, attractive and affordable accommodation, whether for housing or for businesses. Many of the old PPSs helped to define and protect the built heritage and it is hoped that new policies are being put in place to ensure that

that valuable heritage is not lost. **Policy RD2** generally permitting residential extension may be too lax in that it does not take account of unlisted buildings with historic character where permissions will generally need careful examination. **Policy BH1** covering listed buildings specifically appears to provide good protection, but experience has shown that such clauses can be interpreted loosely to the detriment of listed buildings. It is important that planning officers and councillors receive training in the principles and detail of conservation. The section on the setting of listed buildings is good, but again much depends on how individual officers interpret “adverse effect” and such like clauses.

Para 7.4.11 mentions the Venice Charter (which should be capitalised), but later charters such as Burra and Nara provide useful guidance on the significance of townscape and “place” which may be worth citing, particularly in **7.4.14** on ATCs and Conservation Areas and in **Policy BH2**. **Para 7.4.13** makes useful reference to the need for owners to demonstrate that they have made every effort to retain a building before applying for LBC to demolish. It is good to note that economic and structural issues will not be given undue weight.

Para 7.4.16 concerning new building in conservation areas cites physical characteristics such as scale and materials. However conservation areas are not just designated for their physical characteristics, as is hinted at in **para 7.4.17** concerning hierarchy within such areas. It should also mention “patina” because no matter how good a new building might be it simply cannot reflect the historical and social characteristics of the area which are a part of the reason for its designation. This is another reason why demolition should be strongly resisted in conservation areas, since apparently minor demolition can have an effect on the historic characteristics of the area as a whole. This consideration should be added in to **para 7.4.20** - the protection needs to be extended to minor and apparently unimportant buildings of the appropriate age.

There is no mention of Article 4 controls, which are important for the preservation of character of conservation areas - windows and hedges being two examples of important characteristics that are not presently protected. Nor is there any mention of local listing. Both of these should be considered in future guidance.

3. Communities:

Historic buildings are often well-loved local landmarks in the community, but less-significant older buildings also contribute to the security of a familiar place. They are also generally equally appreciated by people across the religious divide, as they are a common heritage. Improving existing buildings rather than redevelopment minimises disruption to communities, such as the dust and noise associated with building works and the social cost of rehousing people and dispersing settled communities.

While it certainly makes sense to build on existing village hubs they should not detract from the central importance of the historic core of the city, and good public transport links to the centre are important.

As indicated above, historic environments, by virtue of their human scale and their continuity, help to improve general health and well-being. They also ensure regional identity, because older buildings are generally local in character and often have a distinctive style that is unique to the area.

CREATING A VIBRANT ECONOMY

1. Economic Growth:

It is often assumed that “Grade A offices” means new buildings, but old buildings can usually be upgraded to meet the requirements of new services and infrastructure. Office blocks built in the 1960s are notoriously hard to upgrade compared to Victorian warehouses, which were built with generous ceiling heights and strong floors capable of accommodating modern cabling and supporting modern office loadings. In addition, older buildings come with built-in character that appeals to many modern office users.

While large scale open-plan offices are sometimes demanded by large multi-national firms, smaller firms - particularly those involved in the creative industries or starting up new businesses - are usually looking for smaller buildings, preferably at lower rentals than are demanded by new buildings. It has been pointed out that the cities that tend to attract and incubate new businesses are the ones with varied older building stock - Cambridge, Bath and Edinburgh being examples. It is important to retain such building stock to ensure that Belfast can offer a wide diversity of office and retail opportunities.

Conventional wisdom is that creating jobs means more offices will be required. However with increased part-time working and working from home becoming almost the norm in many sectors it is questionable that we will need more offices than we already have. The growth of the internet means that a lot of work can be done from home or on the road, and hot-desking in bigger firms means that an expansion of staff does not necessarily mean a physical expansion. Re-using existing buildings means making the most of what is already there, whereas new building can be a hostage to fortune in a rapidly changing market where new office blocks may quickly become redundant. **Policy EC6** is too relaxed in its assumption that new office development in the city centre should be granted - again, there should be a presumption that the use will be met where possible through the use of existing buildings.

The plan suggests that continued regeneration of disadvantaged areas with “high-quality mixed development” will be supported. As indicated above, new building is not necessarily the best way of regenerating areas. Redevelopment of one area can blight neighbouring areas, whereas conservation of the area actually encourages investment in adjoining areas.

2. Retail and City Centre:

The recent fire at Primark has underlined the nature of changes in retail shopping behaviour since the arrival of, firstly, out of town shopping centres and, secondly, online shopping. The failure of the Royal Exchange scheme to find an anchor tenant to trigger its development was probably largely due to those two factors, and the sooner that grand plan is abandoned and small businesses are allowed to repopulate the Donegall Street and North Street conservation area the better.

People no longer need to go into the city to do most of their shopping, so the city centre needs to be reimagined. In many ways the most successful retail in the city now is St George's Market, which is always busy, attracts tourists as well as locals, and offers a wide variety of produce including high quality food that is hard to find in supermarkets. The city centre needs many more small traders, and they cannot afford the overheads of modern retail centres: slightly run-down buildings provide the seed-bed they need to get off the ground, and the more businesses of that type can be attracted into the city, the more will come, in a snowball effect. **Policy RET6** encouraging meanwhile uses is to be welcomed - a temporary use keeps a building occupied, and is greatly preferable to vacancy, and it is often the only way that a small business can make a viable start. It is also essential for many arts and cultural organisations.

Old buildings often provide unique identities for businesses, for which they will pay a premium. There are very good economic reasons therefore why the City Council needs to stop the haemorrhaging of older buildings that has occurred over the last two decades.

3. Tourism, leisure and culture:

It goes without saying that tourists do not come to a city to admire its office blocks. They may come in the first place to see a specific attraction (like the Titanic of the Giant's Causeway), but what enhances their stay and makes them want to revisit or stay longer is the historic infrastructure - the buildings that tell them they are in Belfast and nowhere else. Invariably those are the older buildings with their stories and strong identities.

It is worth pointing out that a place that is attractive to tourists is also attractive to live in, and will attract businesses who want staff to live in the location.

Historic buildings are a cultural resource in themselves, but they also house many of the city's cultural activities. The Ulster Hall and the Grand Opera House offer their customers an architectural experience in addition to the musical or theatrical event.

CONNECTED AND RESILIENT

1. Utilities and Waste:

Improved connectivity and infrastructure are not incompatible with retention of the historic built environment, but it does require careful planning to ensure that improvements do not lead to a loss of built heritage.

As indicated above, historic buildings are often very flexible in terms of reuse, but in a society that is increasingly concerned with waste disposal, adapting existing buildings rather than building new is one of the most positive ways forward. This is at the top of the Waste Hierarchy pyramid in **Figure 9.1** - prevention of waste. Re-using buildings reduces both waste and transportation costs - apparently some 25% of UK landfill is associated with demolition and other building waste. (**Policy ENV2** covers this principle).

Traditional building materials are mostly maintainable and recyclable, unlike most modern building materials from cement to plastic. And in terms of recycling waste, the ultimate recycling is to re-use entire buildings with minimal alteration.

2. Environmental resilience:

“Sustainable development” is a commonly used buzzword that suggests development will be carried out without any net cost to the environment. This is an admirable objective, which we support. But we are sceptical about how the word is often applied in practice. The definition given in the **Glossary** is acceptable, but in practice it is hard to see how almost any new development does not have an impact on the resources left for future generations. In effect we need to greatly reduce our consumption, and two of the main consumers at present are construction and transport - in following that objective we need to look critically at proposals that involve those two factors.

Buildings are often described as performing highly because of the use of “greenwash” technology. However this rarely takes account of the energy cost of building in the first place, so that it will take fifty years for most high-performance new buildings to match the energy consumed by the most basically-insulated existing building. Many office blocks will perform much worse because of high levels of glazing and the energy consumed by ventilation systems, lifts and other technology. Old buildings have the added advantage of solid walls acting as a heat store, averaging out internal temperatures day and night.

The planning system was devised at a time after the war when new building needed to be encouraged to repair bomb-damaged cities - we are now in a situation where we should be considering carefully whether any new development is actually necessary and whether there is not a less environmentally damaging way of achieving the same end.

In terms of transport, Belfast needs to get away from its reliance on the car. Better public transport and making bicycles safer to ride are important, but perhaps even more important is enabling people to walk between destinations, with more permeability in the city centre and pedestrian routes that are quiet, green and on a human scale. Historic buildings are usually ideal for this, being on a small scale, with plenty of visual interest. Having people walking round the city makes it safer and more pleasant and also reduces antisocial behaviour.

A GREEN AND ACTIVE SPACE

1. Natural heritage:

Belfast is well-off for street trees, although there is a tendency for larger trees to be removed and replaced with small-scale ones. The aesthetic and environmental benefits of trees are well-known and it is important to maintain the city's trees, ensuring that vandalised or damaged ones are rapidly replaced with reasonably mature specimens.

Much more damage has been in losing hedges and gardens to development. The conversion of front gardens to parking spaces is common and very damaging, creating hard surfaces that throw more storm water into the city's drains. While not everyone can maintain a hedge, the benefit of traditional privet hedges to the environment is considerable, providing cover for wildlife and deadening traffic noise. It is particularly important to listed buildings, in conservation areas and ATCs, and consideration should be given to taking out Article 4 Directions to control such damage.

CONCLUSION:

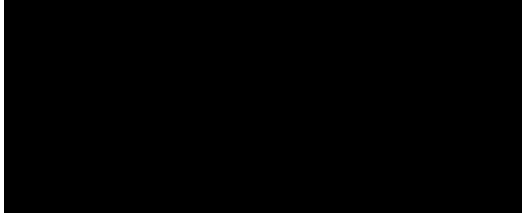
I hope the above responses make clear the benefits of historic buildings to the city. Our comments are intended to emphasise that significance and suggest ways the heritage can be better maintained.

In general we would point out that once a historic building has been damaged by over-zealous alterations or demolished, its historic fabric has gone for ever. As indicated in **section 7.4** of the plan, the precautionary principle should be applied in all applications concerning historic buildings - if it is not absolutely clear that there is a nett benefit, it is better to do nothing. It is hard to see more than a few years ahead, and opportunities can be thrown away if the quality of a listed interior or streetscape is thoughtlessly damaged or lost. It is important that this principle is applied consistently in order to avoid setting precedents for future bad applications.

We would suggest that the Council think of ways of assisting the owners of historic buildings to look after their properties, which contribute so much to the experience of living and working in Belfast. Modest grants for conservation areas, or assisting in maintenance schemes like facilitating communal access to machinery for high-level gutter cleaning could provide communal as well as private benefits.

Finally, historic buildings should not be thought of as an end in themselves. Historic buildings can be houses, offices, theatres, shops - but since they are historic buildings as well they can contribute in so many ways to the identity and economy of a city in addition to their day to day uses.

Yours faithfully



Marcus Patton,
Chair